

EXHIBIT B

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14 *Admitted pro hac vice

15 Attorneys for Plaintiffs

16 UNITED STATES DISTRICT COURT
17 NORTHERN DISTRICT OF CALIFORNIA
18 OAKLAND DIVISION

19 J.R.G., et al.,

20 Plaintiffs,

21 v.

22 UNITED STATES OF AMERICA,
23 Defendant.

CASE NO. 4:22-cv-05183-KAW

**DECLARATION OF JULIANNA RIVERA
MAUL IN SUPPORT OF THE MOTION TO
APPROVE SETTLEMENT INVOLVING
CLAIMS OF A MINOR**

24 I, Julianna Rivera Maul, declare as follows:

- 25 1. I am an attorney at law licensed to practice before the States of California and Michigan, and
26 admitted to practice before the United States Northern District of California.
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- 1 2. I am an attorney of record for Plaintiffs J.R.G. and M.A.R. along with Matt Adams, Aaron
2 Korthuis, Glenda M. Aldana Madrid, and Leila Kang, from the Northwest Immigrant Rights
3 Project.
- 4 3. I have personal knowledge of the facts provided in this declaration.
- 5 4. I am the principal attorney at the Law Office of Julianna Rivera, P.C.
- 6 5. My California Bar Number is 290955.
- 7 6. Co-counsel and I have diligently litigated this matter and have been able to reach an agreement
8 with Defendant to settle Plaintiffs' claims.
- 9 7. As understood by the terms in **Exhibit A**, J.R.G. would receive \$150,000, and her minor
10 daughter M.A.R. would receive \$150,000, for a total of \$300,000 under this agreement.
- 11 8. On information and belief, the settlement total in this case is higher than settlement amounts for
12 actively litigated claims for similarly situated plaintiffs separated at the southern border. *See*,
13 *e.g., A.I.I.L. et al. v. United States*, Civil Action No. 19-cv-00481-TUC-JCH (D. Ariz.), Dkt. 133,
14 134.
- 15 9. In discussing this matter with J.R.G., J.R.G. believes the settlement is in the best interest of
16 M.A.R. as it will avoid further litigation that would require them to re-live their separation and
17 re-traumatize M.A.R. and herself.
- 18 10. Considering the above, co-counsel and I believe this settlement is fair, reasonable, and in the best
19 interests of M.A.R.
- 20 11. Per our retainer agreement with Plaintiffs and the settlement with Defendant, plaintiffs' fees are
21 25% of the settlement award. Accordingly, if the proposed settlement is approved, Plaintiffs'
22 counsel would seek to recover \$37,500 (25% of \$150,000) from the amount awarded to M.A.R.
23 Plaintiffs' counsel does not seek to recover any costs.
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- 1 12. Upon court approval, I will arrange for the deposit of \$112,500, M.A.R.'s portion of the
2 settlement, into an interest-bearing, federally insured blocked account at Chase Bank, where The
3 Law Office of Julianna Rivera, P.C. does its banking. This account will belong to M.A.R.
4 M.A.R. will be entitled to receive these funds once she has reached the age of eighteen.
5 13. We have met and conferred with Defendant's counsel regarding this motion and Defendant does
6 not oppose the relief sought herein.
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8 I declare under penalty of perjury that the foregoing is true and correct. Executed on May 2, 2024, in
9 Oakland, California.

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12 Julianna Rivera Maul
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